

1 George Bumanglag, State Bar No. 56646  
2 1327 N Street  
3 Fresno, California 93721  
Telephone: (559) 268-1636  
Fax: (559) 268-0471  
Email: [Georgevato@aol.com](mailto:Georgevato@aol.com)

4 Attorney for Defendant, Celina Curiel  
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IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF CALIFORNIA

10 THE UNITED STATES OF AMERICA, ) Court No. 2-05-cr-00113-LKK-ALL  
11 ) Plaintiff, ) ORDER RE: MOTION TO CONTINUE  
12 VS. ) ) SENTENCING  
13 CELINA CURIEL, ) )  
14 Defendant. ) Before the Hon. Lawrence K. Karlton  
\_\_\_\_\_  
)

15 TO: THE CLERK OF THE COURT AND TO THE HONORABLE LAWRENCE K.  
16 KARLTON; AND TO THE UNITED STATES ATTORNEY:

17 COMES NOW, attorney George Bumanglag, attorney of record for Defendant CELINA  
18 CURIEL, and hereby moves for an order continuing sentencing in the matter of Celina Curiel.  
19 Said motion is based upon the court's records and upon the declaration of George Bumanglag  
20 attached herein.

21 Dated: January 17, 2007

22 \_\_\_\_\_/s/\_\_\_\_\_  
23 George Bumanglag  
24 Attorney for Defendant,  
25 CELINA CURIEL

26 **IT IF SO ORDERED THAT SENTENCING BE CONTINUED TO FEBRUARY 21, 2007  
at 9:30 AM.**

27 Date: January 22, 2007  
28

  
29 LAWRENCE K. KARLTON  
30 SENIOR JUDGE  
31 UNITED STATES DISTRICT COURT

## DECLARATION OF GEORGE BUMANGLAG

I, George Bumanglag, hereby declare:

I am the attorney of record for Defendant Celina Curiel. The court recently signed the order allowing me to substitute into the case as the attorney of record in place of Krista Hart, defendant's former counsel. I have obtained the files from Krista Hart and have begun reviewing said records. Sentencing is presently set forth January 24, 2007.

On January 8, 2007, I spoke with Mary Grad, Assistant United States Attorney, who is the AUSA in charge of handling the case for the government. On that date, I explained to Ms. Grad that I was in the process of substituting into the case informing her that it was my understanding that the last date for filing objections to the pre-sentence report was Tuesday, Janaruy 9, 2007. I asked her if she would have any objections to continuing the sentencing date and obtaining new dates for filing objections to the report. Ms. Grad informed me that she has no objections to continuing the sentencing date and obtaining new dates for filing objections and that I could state that in this declaration.

The sentencing date for co-defendant Sergio Curiel, Sr. was continued to February 21, 2007 9:30 a.m.

I would ask that sentencing be continued in the case of Celina Curiel to the week of February 19, 2007. I need the additional time to complete my review of the file and prepare for sentencing, including filing any possible objections to the PSR.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 17<sup>th</sup> day of January, 2007 at Fresno, California.

\_\_\_\_\_  
George Bumanglag \_\_\_\_\_/s/\_\_\_\_\_

**PROOF OF SERVICE**  
{Code of Civ. Proc., §§ 1013(a)]}

STATE OF CALIFORNIA) )  
 )ss  
COUNTY OF FRESNO )

I, George Bumanglag, hereby declare:

I am the attorney for Defendant Celina Curiel. On January 17, 2007, I served the foregoing motion using the ECF System.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on **January 17, 2007** at Fresno, California.

George Bumanglag